

Attachment 2 - EEOC Complaint Form

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
DIVISION

FILED

DEC 28 2020

CLERK, U.S. DISTRICT CLERK
WESTERN DISTRICT OF TEXAS
BY NT DEPUTY

Ronnie Bailey

(Name of plaintiff or plaintiffs)

Civil Action Number:

7:20-CV-232

v.

High Roller Sand (HRS)

(Supplied
by Clerk's Office)

(Name of defendant or defendants)

COMPLAINT

1. This action is brought by Ronnie Bailey, Plaintiff,
pursuant to the following selected jurisdiction:

(Please select the applicable jurisdiction)

- ☒ Title VII of the Civil Rights Act of 1964 (42 USC §§ 2000e et seq.) Employment
Discrimination on the basis of race, color, sex (gender, pregnancy and sexual harassment),
religion or national origin.
- ☐ The Age Discrimination in Employment Act (29 USC §§ 621 et seq.) (ADEA).
- ☐ The Americans With Disabilities Act (42 USC §§ 12102 et seq.) (ADA).
- ☐ The Equal Pay Act (29 USC § 206(d)) (EPA).
- ☐ The Rehabilitation Act of 1973 (29 USC § 791 et seq.) (Applicable to federal employees
only).

2. Defendant High Roller Sand (Defendant's name) lives
at, or its business is located at 203 S First St.
(street address), Lufkin (city), Texas
(state), 75901 (zip).

- 3a. Plaintiff sought employment from the defendant or was employed by the defendant at (HRS) HWY 115 13346 E State (street address), (city), Kermit (state), Texas, 79745 (zip).
- 3b. At all relevant times of claim of discrimination, Defendant employed 100 (#) employees. If defendant is a union, at all relevant times of claim of discrimination, Defendant had _____ (#) members.
4. Defendant discriminated against plaintiff in the manner indicated in paragraph 8 of this complaint on or about April (month) 22 (day) 19 (year). If incidents of discrimination occurred more than one day, please indicate the beginning and ending dates of such acts: June 1, 19
5. Plaintiff filed charges against the defendant with the Equal Employment Opportunity Commission (E.E.O.C.) charging defendant with the acts of discrimination indicated in paragraph 7 of this complaint on or about August (month) 22 (day) 2019 (year). (Not applicable to federal civil service employees).
- 6a. The E.E.O.C. issued a **Notice of Right to Sue** which was received by plaintiff on (month) June, 30 (day) 2020 (year). (Not applicable to ADEA and EPA claims or federal civil service employees).

VERY IMPORTANT NOTE:

PLEASE ATTACH A COPY OF YOUR NOTICE OF RIGHT TO SUE AND THE ENVELOPE IN WHICH IT WAS RECEIVED TO THIS COMPLAINT.

- 6b. Please indicate below if the E.E.O.C issued a **Determination** in your case:

☒ Yes
☐ No

VERY IMPORTANT NOTE:

IF YOU CHECKED "YES", PLEASE ATTACH A COPY OF THE E.E.O.C.'S DETERMINATION TO THIS COMPLAINT

7. Because of plaintiff's:

(Please select the applicable allegation(s))

- ☒ Race (If applicable, state race) African American
- ☒ Color (If applicable, state color) Black

- ☒ Sex (gender, pregnancy or sexual harassment) (If applicable, state sex and claim)
☐ Religion (If applicable, state religion) _____
☐ National Origin (If applicable, state national origin) _____
☐ Age (If applicable, state date of birth) _____
☐ Disability (If applicable, state disability) _____
☒ Prior complaint of discrimination or opposition to acts of discrimination.
(Retaliation) (If applicable, explain events of retaliation) _____

The defendant: (please select all that apply)

- ☒ failed to employ plaintiff.
☒ terminated plaintiff's employment.
☐ failed to promote plaintiff.
☒ harassed plaintiff.
☐ other (specify) _____

8a. State **specifically** the circumstances under which defendant, its agent, or employees discriminated against plaintiff **PERSONALLY**:

VERY IMPORTANT NOTE: INCLUDE SPECIFIC DATES, SPECIFIC EVENTS,
AND ANY SPECIFIC COMMENTS MADE BY
DEFENDANT PERTAINING TO THE
DISCRIMINATION CLAIM ALLEGED ABOVE.

Lybrant Sparrow / Courtney Forbes / Causton Magee / Travis Arceneaux

8b. List any **witnesses** who would testify for plaintiff to support plaintiff's allegations and the substance of their testimony:

Attached is a photo of my text message from Josh Stufflebean,
my supervisor / leadman.

8c. List any **documentation** that would support plaintiff's allegations and explain what the documents will prove:

9. The above acts or omissions set forth in paragraphs 7 and 8 are:

- ☐ still being committed by defendant.
☒ no longer being committed by defendant.

10. Plaintiff should attach to this complaint a copy of the charge filed with the Equal Employment Opportunity Commission. This charge is submitted as a brief statement of the facts supporting this complaint.

WHEREFORE, plaintiff prays that the Court grant the following relief to the plaintiff:

- ☐ Defendant be directed to employ plaintiff.
☐ Defendant be directed to re-employ plaintiff.
☐ Defendant be directed to promote plaintiff.
☒ Defendant be directed to Momentary Compensation
and that the Court grant such other relief as may be appropriate, including injunctive orders, damages, costs and attorney's fees.

I declare (or certify, verify, or state) under penalty of perjury that the foregoing is true and correct.

12 / 17 / 2020
Date
Ronnie Bailey
Signature of Plaintiff
1017 Center Ave.
Odessa, Texas 79761
Address of Plaintiff
Odessa Tx 79761
City State Zip Code

Telephone Number(s)

432-208-2195



JEANNETTE J.
CLACK
CLERK OF COURT

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
200 East Wall Street, Room 222
Midland, Texas 79701-5217**

PHILIP J. DEVLIN
CHIEF DEPUTY

October 6, 2020

Ronnie Bailey
1101 W 19th St Apt 16
Odessa, TX 79763

Re: EEOC Complaint form

Dear Mr. Bailey,

Enclosed please find EEOC Complaint form missing on your case. Please fill out this form as soon as possible and return to the court. Your case number is 7:20-CV-232.

Very truly yours,

Jeannette J. Clack, Clerk

N. Torres
By: Deputy Clerk

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DEC 2 8 2020
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FROM: 43220821925
Ronnie Bailey
620 w halsey st.
maryville MO 64468
US

SHIP DATE: 21DEC20
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DIMMED: 12 X 9 X 1 IN

BILL SENDER

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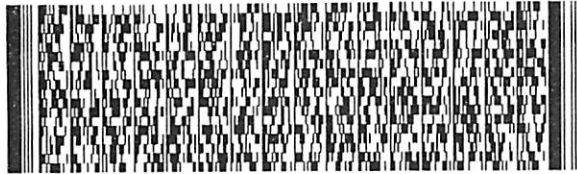
TO Clerk, US DISTRICT COURT WESTERN DIS
Clerk, US DISTRICT COURT WESTERN DIS
200 E Wall St, Ste 222

Midland TX 79701

43220821925
INV:
PO:

REF:

DEPT:



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(US) WESTERN DISTRICT OF TEXAS
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CLERK US DISTRICT COURT W
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STE 222
MIDLAND, TX
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